



October 28, 2013

Ms. Camron Harry
Utah Department of Air Quality
Division of Air Quality
P.O. Box 144820
Salt Lake City, Utah 84114-482

RE: *Comments on UDAQ Posted Information for Hexcel Corporation's West Valley City Plant Regarding the PM2.5 SIP RACT Analysis*

Dear Ms. Harry:

Hexcel Corporation (Hexcel) has reviewed the *RACT Evaluation Report - Hexcel Corporation*, for the Utah PM2.5 SIP RACT posted to the UDAQ website for public comment. Hexcel, respectfully, submits the following comments with regard to the posted document. All comments are referenced to a page in the pdf document posted.

RACT EVALUATION REPORT - HEXCEL CORPORATION COMMENTS

- > P. 3 - The descriptions are taken from the Fiberline 13 and 14 NOI and apply only to these fiberlines.
- > p. 4 (Section 1.4) - Based on a review of the 2008 AEI calculations, the reported numbers are generally lower than reported.
- > p. 5 (Total PTE table) -
 - Fiberline 6 NOX should be 9.93, based on calculations provided to UDAQ.
 - NOX total should be 124.43 based on numbers in this table, with the correction to Fiberline 6.
 - SOX total should be 33.59 based on numbers in this table and the numbers provided to UDAQ by Hexcel.
- > p. 9 (PM2.5 RACT table) -
 - Fiberline 7 \$/ton for Venturi Scrubber is entered incorrectly - should be \$169,598
 - Pilot \$/ton for Venturi Scrubber is entered incorrectly - should be \$1,407,208
 - Pilot \$/ton for Baghouse is entered incorrectly - should be \$4,348,649
 - Matrix \$/ton for Venturi Scrubber is entered incorrectly - should be \$772,503
- > p. 10 (SO2 RACT table) -
 - Fiberline 5 SO2 Venturi Scrubber \$/ton is incorrect. Should be \$319,850
- > p. 11 (PM2.5 + SO2 Venturi table) - It appears that UDAQ calculated cost/ton reduction based on SO2 Cost/total PM2.5 + SO2 tpy reduction. For most lines - cost to implement Venturi for SO2 was less than that for PM2.5 so this is a minimum estimate.
- > p. 113 (Hexcel PTE summary table) - PTE estimates have been included for Lines 15 and 16 - these are not imposed limits, but are included and are not currently conditions that Hexcel must meet. Hexcel does not believe that these estimates should not be included in the assessment. In addition, the emission estimates for Lines 15 and 16 mirror emissions from Lines 13 and 14 and do not account for the estimates sent to UDAQ for these lines.

We hope this information is sufficient for UDAQ's purposes. Please let us know if you require further information. If you have any questions or comments about the information presented in this letter, please do not hesitate to call me at (801) 508-8011.